District Judge James L. Robart 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 JULIO CURY and TAKAO YAMADA, Case No. 2:23-cv-00499-JLR 10 Plaintiffs, THIRD SUPPLEMENTAL JOINT STATUS REPORT 11 v. DEPARTMENT OF STATE, and 12 DEPARTMENT OF HOMELAND SECURITY, 13 Defendants. 14 15 16 **JOINT STATUS REPORT** 17 Pursuant to the Court's Order (Dkt. 12), the parties submit this Joint Status Report. 18 The parties have continued to work in good faith and have narrowed several issues, 19 including agreeing that Counts 4 and 5 are now resolved and are no longer in need of Court 20 resolution. Plaintiffs have raised some additional concerns and Defendants are looking into 21 those concerns to see if the parties may resolve them without motions practice. Based on the 22 ongoing efforts, the parties believe additional issues may be narrowed before briefing, thereby 23 conserving Court and party resources for motions practice. The timing for potential summary 24 judgment briefing for any remaining issues will depend on the results of current ongoing THIRD SUPPLEMENTAL JOINT STATUS REPORT UNITED STATES ATTORNEY

2:23-cv-00499-JLR - 1

UNITED STATES ATTORNEY 700 STEWART STREET, SUITE 5220 SEATTLE, WASHINGTON 98101 (206) 553-7970

1	resolution efforts. Thus, the parties propose to file an additional Joint Status Report on or before
2	May 27, 2024, that updates the Court on the parties' efforts and provides a summary judgment
3	briefing schedule, as needed for any remaining issues.
4	DATED this 25th day of April 2024.
5	Respectfully submitted,
6	NATIONAL SECURITY COUNSELORS
7	s/ Kel McClanahan
0	KEL MCCLANAHAN, WSBA #60671 4702 Levada Terrace
8	
	Rockville, MD 20853 Phone: 301-728-5908
9	Fax: 240-681-2189
10	Email: kel@nationalsecuritylaw.org
11	Attorney for Plaintiffs
12	TESSA M. GORMAN
13	United States Attorney
14	<u>s/ Nickolas Bohl</u>
	NICKOLAS BOHL, WSBA #48978
15	s/ Katie D. Fairchild
16	KATIE D. FAIRCHILD, WSBA #47712
	Assistant United States Attorneys
17	United States Attorney's Office
	Western District of Washington
18	700 Stewart Street, Suite 5220
	Seattle, Washington 98101-1271
19	Phone: 206-553-7970
	Fax: 206-553-4073
20	Email: <u>nickolas.bohl@usdoj.gov</u> Email: <u>katie.fairchild@usdoj.gov</u>
21	
22	Attorneys for Defendants
23	
) / l	